

FILED
UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

19 JUL -2 AM 11:15

CLERK-ALBUQUERQUE

STATE OF NEW MEXICO *ex rel.*
State Engineer,

Plaintiff,
v.

ROMAN ARAGON, *et al.*,

Defendants.

69cv07941 MV/KK

RIO CHAMA STREAM SYSTEM

Section 1: Rio del Oso & Rito Vallecitos

ANSWER TO COMPLAINT FOR ADJUDICATION OF WATER RIGHTS

COMES NOW La Merced de Pueblo (please print your full name)
MERCED DEL PUEBLO ABIQUIU de Abiquiu

and answers the Complaint as follows:

<u>Subfile No</u>	<u>Object</u>	<u>Claim No Right</u>
CHRO-002-0003	<input checked="" type="checkbox"/> <i>DA</i>	<input type="checkbox"/>
CHRO-003-0001	<input checked="" type="checkbox"/> <i>DA</i>	<input type="checkbox"/>
CHRO-004-0001	<input checked="" type="checkbox"/> <i>DA</i>	<input type="checkbox"/>

1. In answer to Complaint: For each subfile listed above, please **initial** in one of the two boxes to indicate whether you object to the description of water right(s) contained in the State's proposed Consent Order, or whether you make no claim as to the water right(s) described in the State's proposed Consent Order.

If you object to the description of water right(s) and reject the State's proposed Consent Order, or if you make no claim as to the water right(s) set forth in the State's proposed Consent Order for any of the Subfile Numbers listed above, for each such Subfile Number please explain in the appropriate spaces below.

I object to the description of the water right(s) described by Subfile Number(s) CHRO-002-0003, CHRO-003-0001 and CHRO-004-0001 because

of incorrect priority dates and omitted additional points of diversion and sources of water. Also omitted was language defining, as part of the livestock pond right, the right to fill and refill the ponds.

(Attach additional pages if necessary)

I made a good faith effort to resolve my disagreement with the State's proposed Consent Order by
Our Board met with the DSE attorney and attempted to negotiate the needed corrections.

(Attach additional pages if necessary)

I claim no right for the water right(s) described by Subfile Number(s) N / A
because

(Attach additional pages if necessary)

2. I understand that by making this claim and filing this document I am not waiving my rights to later raise, in an Amended Answer, any jurisdictional or affirmative defenses I may have.

Dated: 7/2/19


(Signature - MERCED DEL PUEBLO ABIQUIU)

Presidente Merced del Pueblo Abiquiu

PO Box 179

Abiquiu, NM 87510
(Address: Print Clearly)

505-670-7795
(Phone Number: Print Clearly)

The court's address is:
United States District Court Clerk
333 Lomas Blvd. NW, Ste. 270
Albuquerque, NM 87102